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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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August 30, 1995

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United States Department of Energy
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Dr. LaMar Trego, President
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Mr. Joe F. Nemec, President
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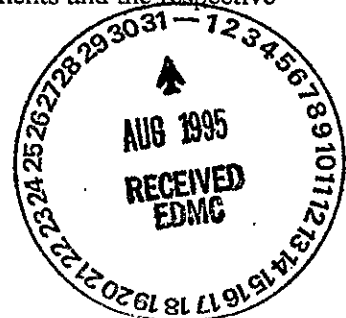
Dear Messrs. Wagoner, Trego, Nemec, and Madia:

This letter transmits the Dangerous Waste Portion of the Hanford Facility Wide *Resource Conservation and Recovery Act* Permit, Revision 2, for the Treatment, Storage, and Disposal of Dangerous Waste (the Permit), as modified in accordance with the Washington State Department of Ecology's (Department) letter dated May 31, 1995. 41266

The enclosed package includes, in addition to the modified Permit, the following documents:

The Public Comment Responsiveness Summary (Attachment 1):

This document lists the Department's responses to all public comments received during the public comment period on the proposed modifications to the Permit. It also includes the changes to the proposed modifications in responses to these comments. The issues raised by these comments and the respective responses will be included in the RCRA Permit Handbook for future reference.



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The Permit Modification Schedule (Attachment 2):

This document provides a schedule of the planned Permit modifications through the year 2000. Changes to this schedule may be made through a "Class 1" modification which requires the Department's approval prior to implementation of the change.

Permit Applicability Matrix (Attachment 3):

This applicability matrix is part of the Permit which clarifies the applicability of the Permit Conditions to the various types of units and areas on the Hanford Facility Site. This matrix has now been modified to include the three new units undergoing closure which were added to the Permit through this modification.

The Closure Plans of the three new units added to the Permit through this modification are approved for implementation. This modified Permit will be effective September 28, 1995. The Permittees must complete the closure activities as described in the approved closure plans within the periods approved, therein which will commence on the effective date of this modified Permit.

The modified Permit also reflects the change of status of the four facilities which have been clean closed (CC). This new status has been noted in the "Table of Contents," the "Unit Specific Chapter," and in the "Permit Modification Schedule."

If you have any questions about any of the above or any of the enclosed attachments, please call Moses Jaraysi, of my staff, at (509)736-3016.

Sincerely,



Mike Wilson, Manager
Nuclear Waste Program

MW:MJ:mf
Attachments

cc: Cliff Clark, USDOE
Doug Sherwood, EPA
Daniel Duncan, EPA
Harold Tilden, PNL
L. A. Mehalik, BHI
Sue Price, WHC
Administrative Record: Hanford Facility Wide Permit

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ATTACHMENT 1

Public Comment Responsiveness Survey

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Public Comment Responsiveness Survey

Attachment 1

The following are the comments submitted by the U.S. Department of Energy, on the Draft Modification Package, submitted for public review on June 8, 1995, of the RCRA Permit for the Treatment, Storage, and Disposal of Dangerous Waste for the Hanford Facility (Permit). These were the only comments the Washington State Department of Ecology (Department) received. The following also includes the responses to these comments and the resulting changes in the proposed modification, if any are warranted.

Comment #1

Condition: V.9.B.a., V.10.B.a., and V.11.B.a.

Requested Action:

Delete and replace with the following text:

"Only if closure activities have not begun and will not be conducted in accordance with the Plan, including these Conditions to the Plan, a written notification shall be submitted to the Department within 30 days after the Plan is approved."

Commenter's Justification:

Closure activities have already begun.

Department Response:

The Department considers the requirement of this condition, as stated in the draft package of this modification, to have been met by the notification given in the Commenter's Justification of this comment.

Permit Change:

Conditions V.9.B.a., V.10.B.a., and V.11.B.a. will read as follows:

"If closure activities have not begun and/or will not be conducted in accordance with the Plan, including these unit specific Conditions to the Plan, a written notification shall be submitted to the Department within 30 days after the Plan is approved."

Comment #2

Condition: V.9.B.g.

Requested Action:

Delete.

Commenter's Justification:

This condition, which applies to the Hanford Patrol Academy Demolition Site, refers to a risk analysis report prepared at the direction of the Ecology unit manager. However, the subject of

the report was a napalm canister that (1) may or may not be within the boundaries of the unit, and (2) was related to non-Resource Conservation and Recovery Act (RCRA) activities. These situations are well documented in the closure plan. Because this risk analysis report does not relate to the closure of this unit, the condition is not applicable to this permit. In addition, the subject report was prepared after all sampling had been completed at the treatment unit, and no further disturbance of the site is anticipated due to RCRA activities.

Department Response:

Comment accepted.

Permit Change:

Requested change will be made.

Comment #3

Condition: V.10.B.d.

Requested Action:

Change V.10.B.d. to V.10.B.f

Commenter's Justification:

V.10.B.d. already exists.

Department Response:

Comment accepted.

Permit Change:

Requested change will be made.

Comment #4

Condition: V.10.B.d.

Requested Action:

Change 180 days to 240 days.

Commenter's Justification:

Due to the complexity and the extent of sodium carbonate cleanup and removal from the 105-DR Large Sodium Fire Facility, an additional 60 days is needed to complete closure activities.

Department Response:

The Department reviewed the planned closure activities with the Permittees' staff, and concluded the Commenter's request is warranted. In accordance with the WAC 173-303-610 (4)(b)(i), the Department approves an extension of 60 days to the allowed closure period of 180 days. Due to the action taken for Comment #3 above, this Condition is now V.10.B.f.

Permit Change:

Requested change will be made.

Comment #5:

Condition: I.A.3., Permit Modification Schedule, Attachment 27, through year 2000.

Requested Action:

Move the 1325-N Liquid Waste Disposal and 1301-N Liquid Waste Disposal closure plan permit modification from the 1998 Modification D to the 1999 Modification E.

Commenter's Justification:

The proposed schedule misplaces the timing for two units: (1) 1325-N Liquid Waste Disposal and (2) 1301-N Liquid Waste Disposal.

Submittal of the Closure Plan/Corrective Action Measures Study (CP/CMS) for these units has been scheduled for March of 1997 in accordance with the Hanford Federal Facility Agreement and Consent Order (Milestone M-15-12B). Regulatory review, comment incorporation, and approval of the CP/CMS would need to be completed in just 7 months in order to initiate advance agency review of Modification D in October 1997. This would be an extremely aggressive schedule considering that previous closure plan regulatory review/approval cycles have exceeded 30 months and planning for all other closure plan included in this schedule are based on at least a one year review/approval process. Therefore, it is requested that these units be placed into the Modification E draft schedule. A corrected schedule is attached.

Department Response:

The Department agrees with the comment and the justification.

Change to Permit:

Requested change will be made.

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